

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

IN RE:

DHC REALTY, LLC.

Debtor.

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§
§
§

Case No. 11-30977-hcm

DEBTOR'S RESPONSE TO GECU'S
MOTION FOR RELIEF FROM AUTOMATIC STAY [DOC #23]

TO THE HONORABLE H. CHRISTOPHER MOTT, U.S. BANKRUPTCY JUDGE:

Comes now, DHC REALTY, LLC, the Debtor herein, by and through its attorneys of record, and files this its Response to the Motion for Relief From Automatic Stay [Doc # 23] (the "Motion") filed herein by Government Employees Credit Union ("GECU"), and in support thereof would respectfully show the Court the following:

1. The Debtor admits the allegations contained in paragraph 1. of the Motion.
2. The Debtor has insufficient information to either admit or deny the allegations contained in paragraph 2. of the Motion. For pleading purposes, the Debtor would deny same.
3. The Debtor admits the allegations contained in paragraph 3. of the Motion.
4. The Debtor has insufficient information to either admit or deny the allegations contained in paragraph 4. of the Motion. For pleading purposes, the Debtor would deny same.
5. The Debtor has insufficient information to either admit or deny the allegations contained in paragraph 5. of the Motion. For pleading purposes, the Debtor would deny same.
6. The Debtor admits the allegations contained in paragraph 6. of the Motion.
7. The Debtor has insufficient information to either admit or deny the allegations contained in paragraph 7. of the Motion. For pleading purposes, the Debtor would deny same.

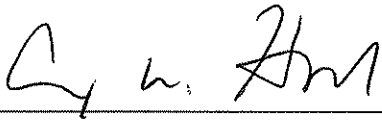
8. Paragraph 8. of the Motion does not call for either admission or denial.

WHEREFORE, PREMISES CONSIDERED, the Debtor prays that the Court set this matter for hearing and grant such relief as may be equitable.

DATED this 22nd day of November, 2011.

Respectfully submitted,

JAMES & HAUGLAND, P.C.
609 Montana Avenue
El Paso, Texas 79902
Phone: 915-532-3911
FAX: (915) 541-6440

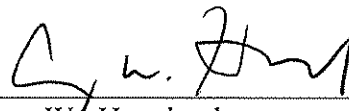
By: 
Corey W. Haugland
State Bar No. 09234200
Attorney for Debtor, DHC REALTY, LLC

CERTIFICATE OF SERVICE

I, Corey W. Haugland, hereby certify that on the 22nd day of November, 2011 a true and correct copy of the foregoing was served upon the following parties via electronic means as listed on the Court's ECF Noticing System; and, on the 22nd day of November, 2011, a true and correct copy of the foregoing was served via U.S. Mail to:

Harrel L. Davis, III
Gordon, Davis, Johnson & Shane, P.C.
4695 North Mesa
El Paso, Texas 79912

and to all creditors and parties in interest listed on the attached creditors matrix.


Corey W. Haugland

Abraham Chowaiki
1037 Singing Hills
El Paso, TX 79912

Basic Sports Apparel, Inc.
301 Williams
El Paso, TX 79901

Chowaiki Holdings, LLC
301 Williams
El Paso, TX 79901

City of El Paso
P.O. Box 2992
El Paso, TX 79999-2992

Comptroller Public Account
P.O. Box 149348
Austin, TX 78714-9348

David & Hilel Chowaiki
301 Williams
El Paso, Texas 79901

David Aelvoet
Linbarger, Goggan, Blair
711 Navarro, Suite 300
San Antonio, TX 78205

David Chowaiki
301 Williams
El Paso, TX 79901

El Paso DHC Enterprises, LLC
301 Williams
El Paso, TX 79901

El Paso Central Appraisal District
5801 Trowbridge
El Paso, TX 79925

El Paso DHC Ent. Far East
301 Williams
El Paso, TX 79901

El Paso DHC Ent. West
301 Williams
El Paso, TX 79901

El Paso DHC Ent., LLC
301 Williams
El Paso, TX 79901

El Paso DHC Enterprises
301 Williams
El Paso, TX 79901

GECU
1225 Airway Blvd.
El Paso, TX 79925

Harrel L. Davis
Gordon, Davis, Johnson & Shane
P.O. Box 1322
El Paso, Texas 79947-1322

Hilel Chowaiki
301 Williams
El Paso, TX 79901

Internal Revenue Service
P. O. Box 7346
Philadelphia, PA 19101-7346

K Simon Construction of Texas
c/o Robert M. Lovein
109 River Oaks Drive, Ste. 100
Southlake, TX 76092

Nadia Nahmed
1037 Singing Hills
El Paso, TX 79912

Spira Sportswear, LLC
301 Williams
El Paso, TX 79901

Texas Workforce Commission
TEC Building - Bankruptcy
101 East 15th Street
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United States Attorney
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United States Attorney General
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United States Trustee
P.O. Box 1539
San Antonio, TX 78295